

IN THE UNITED STATES PATENT & TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL & APPEAL BOARD

In the Matter of Trademark Registration No 3,593,594

Mark: RIG WALKER

Date Registered: March 24, 2009

ENTRO INCORPORATED and
 ENTRO INDUSTRIES, INC.,

Petitioners

v.

THEODORE VORA,

Registrant

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Cancellation No. 92057695

ANSWER TO PETITION TO CANCEL

Registrant Theodore Vora, an individual having an address at 11419 Dover, Houston, Texas 77031 ("Registrant"), hereby responds to a Petition to Cancel the mark RIG WALKER, which was registered on the Principal Register on March 24, 2009. The Petition to Cancel was filed with the Trademark Trial and Appeal Board by Entro Incorporated and Entro Industries, Inc., and a copy of the pleading was mailed to Registrant on August 16, 2013.

Registrant responds to the Petition for Cancellation as follows:

1. Registrant admits the allegations set forth in Paragraph 1 of the Petition to Cancel.



2. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 2 of the Petition to Cancel and, therefore, denies said allegations.

3. Registrant admits the allegations set forth in Paragraph 3 of the Petition to Cancel.

4. Registrant denies the allegations set forth in Paragraph 4 of the Petition to Cancel.

5. Registrant denies the allegations set forth in Paragraph 5 of the Petition to Cancel.

6. Registrant denies the allegations set forth in Paragraph 6 of the Petition to Cancel.

7. Registrant admits the allegations set forth in Paragraph 7 of the Petition to Cancel.

8. Registrant admits the allegations set forth in Paragraph 8 of the Petition to Cancel.

9. Registrant denies the allegations set forth in Paragraph 9 of the Petition to Cancel.

10. Registrant denies the allegations set forth in Paragraph 10 of the Petition to Cancel.

11. Registrant denies the allegations set forth in Paragraph 11 of the Petition to Cancel.

12. Registrant admits the allegations set forth in Paragraph 12 of the Petition to

Cancel.

13. Registrant has insufficient knowledge or information as to the truth of the allegations set forth in Paragraph 13 of the Petition to Cancel and, therefore, denies said allegations.

14. Registrant denies the allegations set forth in Paragraph 14 of the Petition to Cancel.

15. Registrant denies the allegations set forth in Paragraph 15 of the Petition to Cancel.

16. Registrant denies the allegations set forth in Paragraph 16 of the Petition to Cancel.

17. Registrant denies the allegations set forth in Paragraph 17 of the Petition to Cancel.

18. Registrant denies the allegations set forth in Paragraph 18 of the Petition to Cancel.

19. Registrant denies the allegations set forth in Paragraph 19 of the Petition to Cancel.

20. Registrant denies the allegations set forth in Paragraph 20 of the Petition to Cancel.

21. Registrant denies the allegations set forth in Paragraph 21 of the Petition to Cancel.

22. Registrant denies the allegations set forth in Paragraph 22 of the Petition to Cancel.

23. Registrant denies the allegations set forth in Paragraph 23 of the Petition to Cancel.

WHEREFORE, Registrant prays that the Trademark Trial and Appeal Board deny the Petition to Cancel, and that Registration No. 3,593,594 for the trademark RIG WALKER be maintained on the Principal Register.

Respectfully submitted,

THEODORE VORA, Registrant

By Mary J. Gaskin
Mary J. Gaskin
Annelin and Gaskin
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The Woodlands, TX 77380
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Fax: (281) 363-4066
Attorney for Registrant

Date: September 20, 2013

I hereby certify that this Answer to Petition to Cancel is being deposited with the U.S. Postal Service as First Class Mail in an envelope addressed to:


UNITED STATES PATENT AND TRADEMARK OFFICE
Trademark Trial and Appeal Board
P. O. Box 1451
Alexandria, VA 22313-1451

on September 20, 2013.

Mary J. Gaskin
Mary J. Gaskin

CERTIFICATE OF SERVICE

Mary J. Gaskin, attorney for Registrant, hereby certifies that a timely copy of the foregoing Answer to Petition to Cancel was sent to Jeff S. Pitzer and Bryan S. Geon, Pitzer Law, 101 SW Main Street, Suite 805, Portland, OR 97204, USA, via U.S. First Class Mail, this 20th day of September, 2013.

A handwritten signature in cursive script, appearing to read "Mary J. Gaskin", written over a horizontal line.

Mary J. Gaskin